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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15 – 0427 BLF
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER;
v.)	
RAGINI VECHAM, <i>et al.</i> ,)	
Defendants.)	

WHEREAS, the United States and defendants RAGINI VECHAM a/k/a/ Ragini Vechman (“VECHAM”), KISHORE PALLAPOTHU a/k/a Krishna Kishore (“PALLAPOTHU”), SATYANARAYANA TOTA (“TOTA”), and RAMANA REDDY (“REDDY”) are scheduled to appear before the Court for a status hearing on Tuesday, July 12, 2016;

WHEREAS, the Court has determined the need for additional time in order to accommodate this matter on its calendar;

WHEREAS, defense counsel, in any event, are continuing to review and evaluate discovery provided by the United States in this matter relative to preparing for a further status hearing and setting further dates before the Court as well as engaging in discussions with the United States relative to the

1 possibility of a resolution short of trial;

2 WHEREAS, in light of the foregoing, counsel for the parties jointly agree and stipulate that a
3 continuance of this matter is appropriate in order to ensure effective preparation of counsel and
4 continuity of counsel, pursuant to 18 U.S.C. § 3161(h)(7), and that based on their respective calendars
5 and the period needed for the aforementioned discovery matters, an appropriate date for a status hearing
6 when counsel for all parties are next available is Tuesday, August 9, 2016, at 9:00 a.m., a date and
7 time which is also available on this Court's calendar;

8 WHEREAS, the parties further advise the Court that while the parties are in agreement to
9 continue the matter until August 9, 2016, it is possible that lead counsel for the United States
10 will be in trial before the Honorable Edward J. Davila, during the month of August, including August
11 9th. If counsel for the United States becomes unavailable on August 9th, the parties will submit a
12 proposed stipulation and order to an available date, at the earliest possible opportunity for this Court's
13 review and consideration.

14 THEREFORE, the parties also mutually and jointly stipulate that the matter be continued for
15 defendants VECHAM, PALLAPOTHU, TOTA, and REDDY from July 12, 2016, until August 9, 2016,
16 and further jointly stipulate and agree that time should be excluded from July 12, 2016, up to and
17 including August 9, 2016.

18 All the parties agree that excluding time until August 9, 2016, is necessary, given the need to
19 maintain continuity of counsel and for effective preparation of counsel. The parties also agree that
20 failing to grant a continuance would deny counsel for the defense the reasonable time necessary for
21 effective preparation and continuity of counsel, taking into account the exercise of due diligence. *See* 18
22 U.S.C. § 3161(h)(7). Finally, the parties agree that the ends of justice served by excluding time from
23 July 12, 2016, up to and including until August 9, 2016, outweigh the best interest of the public and the
24 defendant in a speedy trial. *Id.* § 3161(h)(7).

25 **IT IS SO STIPULATED.**

26
27 DATED: June 3, 2016

/s/
ETHAN BALOGH
Attorney for SATYANARAYANA TOTA

1 DATED: June 3, 2016

/s/
EDWIN PRATHER
Attorney for KISHORE PALLAPOTHU
a/k/a Krishna Kishore

4 DATED: June 3, 2016

/s/
NANCI CLARENCE
Attorney for RAGINI VECHAM
a/k/a/ Ragini Vechman

7 DATED: June 3, 2016

/s/
ISMAIL RAMSEY
Attorney for RAMANA REDDY

10 DATED: June 3, 2016

BRIAN J. STRETCH
United States Attorney

/s/
TIMOTHY J. LUCEY
Assistant United States Attorney

16 **IT IS SO ORDERED.**

17 **DATED:**

HONORABLE BETH L. FREEMAN
United States District Court